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Attorneys for Members of The Dowling College Board of Trustees

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

DOWLING COLLEGE

Chapter 11

Case No. 16-75545 (REG)

Debtor and Debtor in Possession.

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**RESERVATION OF RIGHTS OF BOARD OF TRUSTEE
MEMBERS TO COMMITTEE'S MOTION FOR STANDING
AND AUTHORITY TO PROSECUTE CLAIMS ON BEHALF OF ESTATE**

Certain members¹ (collectively the "Board") of the Board of Trustees of Dowling College, by their attorneys Meyer, Suozzi, English & Klein, P.C., hereby state their reservation of rights with respect to the *Creditors' Committee Motion For An Order Granting Leave, Standing And Authority To Prosecute Claims On Behalf of Dowling's Estate*, dated August 27, 2018 (the "Motion"), as follows.

1. The Board takes no position as to the Motion.
2. The Board hereby notes a full reservation of rights as to the factual recitation set forth in the Motion and as to the legal and factual merits of any claims or causes-of-action

¹ Michael Puorro, Gerald Curtin, Ronald Parr, Patricia Blake, John Racanelli, Joseph Posillico and Jack O'Connor.

outlined in the Motion or which may be asserted based on the Motion and the grant of standing to the Committee.

3. The Board reserves all rights, claims, remedies, defenses and to contest any allegations or factual assertions.

WHEREFORE, the Board respectfully requests that the Court grant it such relief as may be just and proper.

Dated: Garden City, New York
September 17, 2018

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.

By: /s/ Howard B. Kleinberg

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